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Department of Environmental Quality



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SECRETARY

November 5, 1998

CERTIFIED MAIL P 138 802 911
RETURN RECEIPT REQUESTED

Mr. Jaswant S. Gill, Plant Manager
CYTEC INDUSTRIES INC
Fortier Plant
10800 River Road
Westwego, LA 70094

RE: CYTEC Industries, Inc.
LAD 008 175 390
RCRA Part II Permit Renewal Application
Administrative Completeness Review I/Notice of Deficiency (NOD) I

Dear Mr. Gill:

The Hazardous Waste Division (HWD) has completed the administrative completeness review of the RCRA Part B Permit Renewal Application, dated June 1, 1998. The review began on September 1, 1998, after receipt of your application fee. The HWD has determined that the permit renewal application is deficient. Attached is a Notice of Deficiency resulting from the review.

This letter constitutes notification that you are required to submit five (5) copies of written responses to the attached Notice of Deficiency to the HWD within thirty (30) days after receipt of this letter. Lockheed Martin must provide a written response to each individual deficiency as listed. Revised tables or figures may also be submitted, if required. If an applicant fails or refuses to correct deficiencies in the application, the permit renewal may be denied by the Administrative Authority.

Questions or comments should be addressed to Mr. Shan Schatzle or Mr. Eric Garner of the HWD, Permits Section at (504) 765-0272.

Sincerely,

James H. Brent

James H. Brent, Ph.D.
Administrator

JHB/EG/eg

RECEIVED

DEC 02 1998

Dept. of Environmental Quality
Hazardous Waste Record Center

CYTEC INDUSTRIES, INC
LAD 008 175 390
RCRA Part II Permit Renewal Application
COMPLETENESS NOTICE OF DEFICIENCY I

#	REGULATION/LOCATION	COMMENTS
1.	LAC 33:V.517.L	In response to this regulation, the applicant references a list of general qualifications of key operating positions at the facility in Appendix S. No list was found. Therefore, the applicant must provide this information.
2.	LAC 33:V.Chapter 7, 9, 11, and 13	No response is provided to Chapters 7, 9, 11, or 13. In order for the application to be deemed complete, the applicant must respond to all applicable regulations contained within LAC 33:V. If a chapter or specific regulation within a chapter does not apply, the applicant must provide a response that states why the regulation is not applicable.
3.	LAC 33:V.Chapter 17	<p>The Memorandum of Understanding (MOU), referenced in the response to LAC 33:V.1701, covers RCRA, but the response citing the MOU does not explain what is done that meets or exceeds the regulations. The applicant must include all of Chapter 17 text and respond to the cited text in detail, explaining what is done to meet the requirements, rather than simply referencing the MOU.</p> <p>Additionally, the federal provisions in 40 CFR Subpart CC have not been incorporated into LAC 33:V. Chapter 17. The applicant must cite Subpart CC using the Code of Federal Regulations text and respond to the cited text in detail, explaining what is done to meet the requirements, rather than simply referencing the MOU.</p>
4.	LAC 33:V.Chapter 33	LAC 33:V.3303 and subsequent regulations of Chapter 33 are not included. If the Chapter or specific regulations within the Chapter do not apply, the applicant must provide a response that states why the regulation is not applicable.

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#	REGULATION/LOCATION	COMMENTS
5.	LAC 33:V.Chapter 35	LAC 33:V.3521 and subsequent sections of Chapter 35 are not included. If the Chapter or specific regulations within the Chapter do not apply, the applicant must provide a response that states why the regulation is not applicable.
6.	LAC 33:V.3707.F.1.a&b	These regulations were cited using an older version of LAC 33:V. The regulations cited in the application should be taken from the most recent version of LAC 33:V.
7.	LAC 33:V.3711.F.1.a&b	These regulations were cited using an older version of LAC 33:V. The regulations cited in the application should be taken from the most recent version of LAC 33:V.
8.	LAC 33:V.3715.F.1.a&b	These regulations were cited using an older version of LAC 33:V. The regulations cited in the application should be taken from the most recent version of LAC 33:V.
9.	LAC 33:V.3719.G	These regulations were cited using an older version of LAC 33:V. The regulations cited in the application should be taken from the most recent version of LAC 33:V.
10.	LAC 33:V.Chapters 38, 39, and 40	Chapters 38, 39, and 40 are not cited, nor is it explained that these operations are not conducted at the facility. The applicant must cite the regulations contained within these chapters, and provide a response. If the chapter or specific regulations within the chapter do not apply, the applicant must provide a response that indicates why.

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11.	LAC 33:V.Chapters 43 and 49	Chapters 43 and 49 are not cited nor is it explained why the chapters do not apply. The applicant must cite the regulations contained within these chapters and provide a response. If the chapter or specific regulations within the chapter do not apply, the applicant must provide a response that indicates why.
12.	LAC 33:V.Chapter 51	Application fees were submitted separate from the Part A/B document. Responses to Chapter 51 and any calculation of application fees should be submitted with the Part B application.